

SPOKANE MESSENGER &  
PROCESS SERVICE  
164 S. WASHINGTON, 400  
SPOKANE WA 99201

Judge Patricia C. Williams

MICHAEL A. PATTERSON  
KAREN A. KALZER  
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Attorneys for Defendant Corporation  
Of The Catholic Archbishop Of Seattle

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON  
AT SPOKANE

In re

THE CATHOLIC BISHOP OF  
SPOKANE a/k/a/ the CATHOLIC  
DIOCESE OF SPOKANE, A  
Washington corporation sole,

Debtor.

JOHN DOE, JAMES DOE and JOSEPH  
DOE (psudonyms),

Plaintiffs,

vs.

CATHOLIC ARCHBISHOP OF  
SEATTLE, a Washington non profit  
corporation, CATHOLIC BISHOP OF  
SPOKANE, a Washington non profit  
corporation; and PATRICK  
O'DONNELL, individually,

Defendants.

Bankr. No: 04-08822-PCW11

Adv. Proc. No. 05-80004-PCW

SEATTLE ARCHDIOCESE'S  
STATEMENT RE: SPOKANE  
DIOCESE'S NOTICE OF  
REMOVAL PURSUANT TO  
28 U.S.C. 1451 AND F.R.B.P.  
9027

FILED

FEB 11 2005

T.S. MCGREGOR, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

(958475.DOC)

SEATTLE ARCHDIOCESE'S STATEMENT RE:  
SPOKANE DIOCESE'S NOTICE OF REMOVAL  
PURSUANT TO 28.U.S.C. 1451 AND F.R.B.P. 9027 - 1

LEE SMART COOK MARTIN & PATTERSON

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ORIGINAL

1 COMES NOW Defendant Corporation Of The Catholic Archbishop Of  
2 Seattle (the "Seattle Archdiocese"), a non profit corporation sole, referred to in  
3 the caption above as Catholic Archbishop Of Seattle, a Washington non profit  
4 corporation, and makes the following statement concerning the allegations  
5 contained in the Spokane Diocese's Notice Of Removal Pursuant To 28.U.S.C. §  
6 1451 and F.R.B.P. 9027.

6 1. Admit.

7 2. Admit.

8 3. Admit.

9 4. Admit.

10 5. Admit.

11 6. Admit.

11 7. The bankruptcy proceeding is a core proceeding under 28 U.S.C. §  
12 157 (b)(2)(A) and (B). As a core proceeding, the Seattle Archdiocese does not  
13 consent to entry of final orders or judgment by the bankruptcy judge. Under 28  
14 U.S.C. § 157(b)(5), plaintiffs' claims must be tried in the district court.

15 8. Admit.

16 The Seattle Archdiocese specifically reserves the right to raise the issue of  
17 whether the bankruptcy court has jurisdiction to hear this matter.

18 A copy of this Statement Re: Spokane Diocese's Notice of Removal  
19 Pursuant to 28.U.S.C. 1451 and F.R.B.P. 9027 has been served upon counsel of  
20 record for all parties.

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24 SEATTLE ARCHDIOCESE'S STATEMENT RE:  
SPOKANE DIOCESE'S NOTICE OF REMOVAL  
PURSUANT TO 28.U.S.C. 1451 AND F.R.B.P. 9027 - 2

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1 DATED this 10<sup>th</sup> day of February, 2005.

2 LEE SMART COOK MARTIN &  
3 PATTERSON, P.S., INC.

4  
5 By: Michael A. Patterson  
6 Michael A. Patterson, WSBA No. 7976  
7 Karen A. Kalzer, WSBA No. 25429  
8 Of Attorneys for Defendant Catholic  
9 Archbishop Of Seattle  
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24 SEATTLE ARCHDIOCESE'S STATEMENT RE:  
SPOKANE DIOCESE'S NOTICE OF REMOVAL  
PURSUANT TO 28.U.S.C. 1451 AND F.R.B.P. 9027 - 3

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